



SEXUAL HARASSMENT POLICY

OF

VISION INFRA EQUIPMENT SOLUTIONS

LIMITED



Preamble

The Policy Statement **Vision Infra Equipment Solutions Limited** (hereinafter referred as "the Company") is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. The company will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

Definition of sexual harassment

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal.

Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours
- Verbal conduct
- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)
- Non-verbal conduct
- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

According to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 only women can be a victim of sexual harassment, regardless of the sex of the harasser. The company recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.



The company recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee. Anyone, including employees of the company, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within the company premises or outside, including at social events, business trips, training sessions or conferences sponsored by the company.

Complaint procedures

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. The company recognises that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser. If a victim cannot directly approach an alleged harasser, she can approach one of the designated committee members responsible for receiving complaints of sexual harassment. When a designated committee member receives a complaint of sexual harassment, he/she will:

- immediately record the dates, times and facts of the incident(s) in the prescribed form
- ascertain the views of the victim as to what outcome she wants
- ensure that the victim understands the firm's procedures for dealing with the complaint
- discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if she is not satisfied with the outcome
- keep a confidential record of all discussions
- respect the choice of the victim
- ensure that the victim knows that they can lodge the complaint outside of the firm through the relevant country/legal framework

Throughout the complaint procedure, a victim is entitled to be helped by a counsellor (member of committee) within the company. The company will nominate a number of counsellors and provide them with special training to enable them to assist victims of sexual harassment. The company recognizes that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. The company understands the need to support victims in making complaints.

1) Informal complaint mechanism

If the victim wishes to deal with the matter informally, the designated committee member will:

- give an opportunity to the alleged harasser to respond to the complaint
- ensure that the alleged harasser understands the complaint mechanism
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter formally to the Internal Complaint Committee (ICC) within the firm to resolve the matter
- ensure that a confidential record is kept of what happens



- follow up after the outcome of the complaint mechanism to ensure that the behaviour has stopped
- ensure that the above is done speedily and within 90 days of the complaint being made.

2) Formal complaints mechanism

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter. The designated committee member who initially received the complaint will refer the matter to ICC to instigate a formal investigation. The ICC may deal with the matter in accordance with this policy

The members carrying out the investigation will:

- get the prescribed form filled and interview the victim and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place
- produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
- if it cannot be determined that the harassment took place, she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within 90 days of the complaint being made

Outside complaint mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the firm. They can do so through wishful means.

Sanction and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension



- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

Implementation of this policy

The company will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the firm. Every year, The company will require all employees to attend a refresher training course on the content of this policy. It is the responsibility of every proprietor to ensure that all the employees are aware of the policy.

Awareness program

To create awareness among the employees for about the adherence of The Protection of Women from Sexual Harassment Act, 2013 to organize the awareness program and workshops from time to time.

Monitoring and evaluation

The company recognises the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective. ICC being responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the firm will evaluate the effectiveness of this policy and make any changes needed.

For VISION INFRA EQUIPMENT SOLUTIONS LIMITED

Sd/-

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Place: Pune